

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MICHAEL ROBERTS,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	NO. 05-cv-0454 (GMS)
	:	
ALTAIR LINES, S.A.,	:	
	:	
Defendant/Third-Party Plaintiff,	:	
	:	
v.	:	
	:	
ACTIVE CRANE RENTALS, INC.,	:	
	:	
Third-Party Defendant.	:	

**REQUEST FOR DOCUMENT PRODUCTION ADDRESSED TO ALL DEFENDANTS
BY DEFENDANT, ACTIVE CRANE RENTALS, INC.**

You are hereby requested to produce, in accordance with Federal Rule of Civil Procedure 34, the originals or clear, readable copies of the below listed documents and/or items. These documents and/or items will be processed and photographs reproduced. The below listed documents and/or items are to be produced at the offices of Deasey, Mahoney & Bender, Ltd., Suite 1300, 1800 John F. Kennedy Boulevard, Philadelphia, Pennsylvania 19103-2978, within thirty (30) days. Such request is continuing up to and at the time of trial.

1. The entire claims and investigation file or files of the defendant and/or its counsel or any other organization, excluding references to mental impressions, conclusions or opinions representing the value or merit of the claim or defense or respecting strategy or tactics and privileged communication from counsel.

2. All statements, memoranda, or writings (signed or unsigned) of any and all witnesses including any and all statements, memoranda, writings of plaintiff and/or defendants.
3. All photographs, recordings, films, charts, sketches, graphs and diagrams taken and/or prepared.
4. Any and all documents containing the names and home and business addresses of all individuals contacted as potential witnesses.
5. All reports and Curriculum Vitae of any and all experts who will testify at trial.
6. Any and all reports of this incident.
7. Any and all documents requested in interrogatories directed to you.
8. All records documenting work performed by Murphy Marine Services, Inc., Magco Crane Rentals, Inc. or Altair Lines, SA in discharging cargo on the M/V SHINANO REEFER, including but not limited to Daily Work Reports, Time Sheets, Work Logs, Production Reports, Checker Reports, Hatch Tallies, Hatch Reports, Work Summaries, Gang Lists, and time Sheets from Employees who worked on or about June 30, 2003 at the Port of Wilmington on board the M/V SHINANO REEFER.

REGER RIZZO KAVULICH & DARNALL, LLP

BY: /s/ Louis J. Rizzo, Jr.
LOUIS J. RIZZO, JR., ESQUIRE
1001 Jefferson Plaza, Suite 202
Wilmington, DE 19801
(302) 652-3611

Attorney for Defendant,
Active Crane Rentals, Inc.

Date: July 31, 2006

Pro Hac Vice Counsel:

Francis J. Deasey, Esquire
DEASEY, MAHONEY & BENDER, LTD.
1800 John F. Kennedy Boulevard, Suite 1300
Philadelphia, PA 19103
(215) 587-9400 (phone)
(215) 587-9456 (fax)

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of Defendant, Active Crane Rental's Request for Production of Documents Directed All Defendants was serviced upon all counsel by first class mail, postage prepaid, on the date set forth below:

Michael B. McCauley, Esquire
Richard Q. Whelan, Esquire
Palmer, Biezup & Henderson, LLP
1223 Foulk Road
Wilmington, DE 19803

(Attorneys for Defendant/Third-Party Plaintiff Altair Lines, S.A.)

Peter E. Hess, Esquire
Law Offices of Peter E. Hess
P.O. Box 7753
Wilmington, DE 19803
(Attorneys for Plaintiff, Michael Roberts)

Lynne M. Parker, Esquire
Hollstein, Keating, Cattell, Johnson & Goldstein, PC
1201 N. Orange Street, Suite 730
Wilmington, DE 19801
(Attorney for Defendant, Murphy Marine Services, Inc.)

Nicholas E. Skiles, Esquire
Swartz Campbell LLC
919 Market Street
P.O. Box 330
Wilmington, DE 19899
(Attorney for Fourth-Party Defendant, Magco Crane Rentals)

REGER RIZZO KAVULICH & DARNALL, LLP

BY: /s/ Louis J. Rizzo, Jr.
LOUIS J. RIZZO, JR., ESQUIRE
Attorney for Defendant, Active Crane Rentals,
Inc.

Date: July 31, 2006